

Law Office of  
**Stephen J. Springer**  
2033 Walnut Street  
Philadelphia, PA 19103  
(215) 972-9050  
(215) 732-8232 (Facsimile)  
springerlaw@msn.com

June 12, 2003

**VIA FACSIMILE**

The Honorable James Knoll Gardner  
EDWARD N. CAHN UNITED STATES COURTHOUSE  
504 W. Hamilton Street, Suite 4701  
Allentown, PA 18101

Re: ***Evelyn Bayo Antonsen v. The School District of the City of Allentown***  
**Civil Action No. 02-CV-2724**

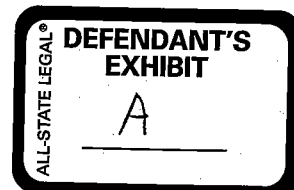
Dear Judge Gardner:

On behalf of Plaintiff, Evelyn Bayo Antonsen, I hereby request a 90-day extension of all deadlines in the above-referenced matter. This is the first such request for an extension.

My reasons for requesting this extension are twofold. Plaintiff and Defendant have exchanged documents although there are still additional documents which Plaintiff has requested that have not been produced so far by Defendant. Plaintiff's deposition has been taken. The deposition of an assistant superintendent was taken on two different days because of scheduling problems. That deposition has not yet been completed. In addition, Plaintiff's counsel is working with Defendant's counsel to schedule the deposition of the former superintendent of the School District. Plaintiff's counsel already has given Defendant's counsel notice of subjects to be covered by a Rule 30(b)(6) deposition and we are currently working to set up a date for that deposition.

Second, my wife and I have pre-existing plans to be in California from July 12, 2003 through August 20, 2003, to assist our daughter who is expecting her second child. Our daughter has had prior pregnancy difficulties and a miscarriage.

I am enclosing a Stipulation signed by counsel regarding this requested extension.



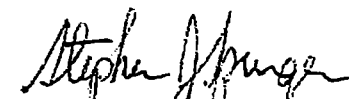
**Law Office of Stephen J. Springer**

The Honorable James Knoll Gardner  
June 12, 2003  
Page 2

Thank you in advance for your consideration of this request.

Respectfully,

**LAW OFFICE OF STEPHEN J. SPRINGER**

  
Stephen J. Springer

SJS:jd

Enclosure

cc: John E. Freund, III, Esquire (w/enclosure; via Facsimile)



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springerlaw@msn.com

June 26, 2003

**VIA FACSIMILE - (610) 776-0379**

U.S. Magistrate Judge Arnold C. Rapoport  
U.S. COURTHOUSE & FEDERAL BUILDING  
504 W. Hamilton Street, Suite 3401  
Allentown, PA 18101

**Re: *Evelyn Bayo Antonsen v. The School District of the City of Allentown***  
**Civil Action No. 02-CV-2724**

Dear Judge Rapoport:

I am enclosing a copy of a letter and Stipulation which I sent to Judge Gardner two-weeks ago in connection with the above-referenced case. Judge Gardner already has granted an extension of time to the parties in another action, *Gehris v. Bethlehem Area School District*, Civil Action No. 02-CV-08447, which previously had the same deadlines as the *Antonsen* matter.

Since the current discovery deadline is quickly approaching, I would appreciate anything that Your Honor can do with respect to my pending request.

Respectfully,

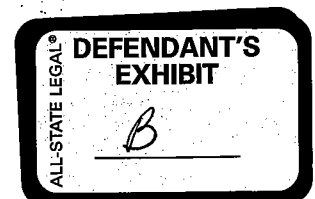
**LAW OFFICE OF STEPHEN J. SPRINGER**

  
Stephen J. Springer

SJS:jd

Enclosures

cc: John E. Freund, III, Esquire (w/enclosure; via Facsimile)



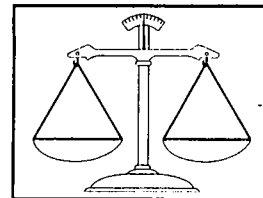
**KING, SPRY, HERMAN, FREUND & FAUL, LLC**

One Bethlehem Plaza - Suite 700

Bethlehem PA 18018

610-332-0390

610-332-0314 (fax)



**FACSIMILE TRANSMISSION SHEET**

TO: A. Martin Herring, Esquire

FROM: John E. Freund, III, Esquire

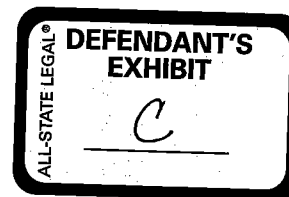
RE: Antonsen v. ASD

DATE: 18 July 2003

FAX: 215.568.2751

Page 1 of 2

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**KING, SPRY, HERMAN, FREUND & FAUL, LLC**

ATTORNEYS & COUNSELORS

ALLENTOWN

BANGOR

BETHLEHEM

STROUDSBURG

July 18, 2003

FAX

E. DRUMMOND KING  
JEROME B. FRANK  
DONALD F. SPRY II  
DOMENIC P. SBROCCHI  
KENT H. HERMAN  
TERENCE L. FAUL  
JOHN E. FREUND, III  
JAMES F. SWARTZ, III\*  
KEVIN C. REID  
PAUL S. FRANK  
MICHAEL A. GAUL  
ANN MARIE T. NASEK  
JESSICA A. DAVENPORT

OF COUNSEL:  
ANDREW E. FAUST  
JAMES J. RAVELLE

AFFILIATED WITH:  
LAW OFFICES OF Ira Weiss  
Pittsburgh, PA 15219

\* Certified Civil Trial  
Advocate by National  
Board of Trial Advocacy

A. Martin Herring, Esquire  
Suite 2240  
1845 Walnut Street  
Philadelphia, PA 19103

RE: Antonsen v. Allentown School District  
No. 02-CV-2724

Dear Marty:

On June 12, 2003, Attorney Springer forwarded a letter to Judge Gardner requesting a 90 day extension of all deadlines in the above matter. We also signed a Stipulation regarding the request. We have not yet heard from the Court or Mr. Springer whether this request was granted or not. I understand that Mr. Springer is now in California. Do you have any information regarding the deadline extension?

I am concerned because our dispositive motion is due on August 15<sup>th</sup> under the previous deadlines. If the 90 day extension is granted, our motion would be due on November 15<sup>th</sup> but trial has been scheduled for October 20<sup>th</sup>. I don't recall that Mr. Springer asked for an extension of the trial date.

Please let us know what you find out.

If you would like to discuss this matter further, please do not hesitate to contact our office.

Very truly yours,

  
John E. Freund, III

JEF/tlm

TRANSMISSION VERIFICATION REPORT

TIME : 07/18/2003 12:54  
NAME : KING SPRY LAW OFFICE  
FAX : 6103320314  
TEL :

DATE, TIME	07/18 12:53
FAX NO./NAME	12155682751
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MODE	STANDARD ECM

**KING, SPRY, HERMAN, FREUND & FAUL, LLC**  
One Bethlehem Plaza - Suite 700  
Bethlehem PA 18018  
610-332-0390  
610-332-0314 (fax)



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